

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

REVLON CONSUMER PRODUCTS LLC and
ELIZABETH ARDEN, INC.

Plaintiffs,

-against-

GIVE BACK BEAUTY S.A., et al.,

Defendants.

Case No. 1:24-cv-06438-ER-RWL

I, Dominick Romeo, under penalty of perjury, hereby declare as follows:

1. I am over the age of 18 years of age and competent to testify. I submit this Declaration in support of Defendants' Opposition to Plaintiffs' Motion for a Preliminary Injunction and Defendants' Opposition to Plaintiffs' Motion for Expedited Discovery. I have personal knowledge of the subject matter set forth herein.

2. I joined Revlon as a Senior Marketing Manager for Elizabeth Taylor fragrances in April 2019. I worked there until May 29, 2024. At the time I left Revlon, I was Director of Global marketing for celebrity fragrances, where I was responsible for all product innovation, global strategy, and vision. In my last role, I worked on Britney Brands.

[REDACTED]

[REDACTED]

4. On April 19, 2024, I was contacted by GBB asking if I was interested in pursuing opportunities with the company. I indicated I was and later that day I had a phone interview with Corrado Brondi. I had subsequent interviews with GBB employees on April 29, 2024, May 1, 2024,

and May 3, 2024. I received an offer letter from GBB on May 7, 2024, which I accepted May 8, 2024.

5. While I was interviewing with GBB, I never had any discussions with any of my Revlon colleagues about the fact that I was interviewing with GBB. I only learned that Vanessa Kidd left Revlon to go to work for GBB when I received my offer letter, which indicated I would be reporting to her. Although I knew that Ashley Fass and Reid Mulvihill were leaving Revlon, I did not learn that they went to GBB until my first day of work.

6. On May 9, 2024, I gave notice to Revlon that I would be leaving. After giving notice, I continued to perform my duties at Revlon until my last day, which was on May 29, 2024. During my last weeks at Revlon, I continued to use the company's computer to perform my job.

7. I understand Revlon conducted a forensic examination of my computer and that the examination revealed on May 17, 2024, I accessed my personal Gmail account and a Google document. Although I don't have any specific recollection of accessing my Gmail account on that day, it would not surprise me if I did because part of my job at Revlon included overseeing and approving influencer postings involving Britney Brands. Those postings were sent to me in a Google document and, in order to access the files, I had to use my personal Gmail account because Revlon did not have a Gmail account. I did not use the information in the Google documents for any purpose other than to perform my duties at Revlon. I have not accessed any of those documents while at GBB.

8. I joined GBB on June 10, 2024 as the Vice President Global Marketing for Celebrity Fragrances. My responsibilities include business development of future celebrity licensees, as well as day-to-day involvement with the company's current line of celebrity fragrances. I am not

involved in business development pitches for any celebrities or brands that are or were a part of the Revlon portfolio.

9. I was not involved in the negotiations between GBB and Britney Brands and did not share any Revlon confidential information with GBB neither before nor after joining the company. Since joining GBB, I have worked with Vanessa Kidd to prepare GBB to perform under the GBB/Britney Brands contract, which takes effect on January 1, 2025. My responsibilities in this regard may include contacting fragrance houses, but I have not yet done so, and working with the supply chain team to coordinate with bottle suppliers. In performing these duties, I have never used or discussed Revlon's trade secrets or confidential information.

10. At no time point did I take any Revlon trade secrets or confidential information. I have never used any of Revlon's trade secrets or confidential information while at GBB, and no one at GBB has ever asked me to provide them with Revlon's trade secrets or confidential information.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct and that this Declaration is executed in New York, New York on this 20th day of September 2024.

By:  Signed by:
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Dominick Romeo